

respectfully points out to the Examiner that Claims 1-29 were cancelled in a Preliminary Amendment filed on March 11, 1998 in the instant application. These claims were cancelled at the same time that Claims 30-55 were added to this application. As such, any rejection drawn to a cancelled claim would be improper. Withdrawal of this rejection is respectfully requested.

REJECTIONS UNDER 35 USC 102(b)

Claims 30-55 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Lockwood et al. (4,359,631). Within claims 30-55, claims 30, 39, 46, and 55 are independent claims which each recite a limitation "integrating the selected product image, the selected product environment image and the selected text segment into a customized visual output." (emphasis added). In order for these rejections to be proper, Lockwood et al. must teach the inclusion of the quoted limitation within a electronic proposal preparation system.

In support of her rejection of Claim 30, the Examiner cited several passages in support of her assertion that Lockwood et al. teaches the above limitation. The cited passages included (col. 3, lines 10-41, col. 4, lines 39-68, col. 5, lines 1-6, and col. 6, lines 16, 21, 56-61) see lines 1-2 on page 6 of the Office Action.

However, none of these cited passages teach the above limitation. Col. 3, lines 10-41 states:

The present embodiment of the invention is designed to provide travel-related information and services. The first component of the data source 26 is a video storage and playback unit 27 which holds recordings of various travel documentaries promoting tours, cruises, special events, resort facilities and other vacation opportunities. Each documentary is indexed and can be recalled on demand and played on the cathode ray tube 10. A second source of data is provided by a mass storage unit 28 which contains information of a more transitory nature such as flight schedules to various destinations, ticket prices, weather information, snow conditions at various skiing resorts, hotel occupancy status and other information useful in the planning of a business trip or vacation. This information is periodically updated via a communication link 24 with a remote control center. The information contained in the mass storage unit 28 can be selectively displayed in alpha numerical form on the CRT 10. The CRT can also be used to display regular broadcasted television programs as well as scheduled and private cable television productions. Any information or image displayed on the CRT 10 can also be delivered in a hard copy form by a printer 11. All requests for services or information are entered by the customer via the keyboard 20. Payments for the services may be effected either by depositing coins in the coinbox 21 or by charging it to a credit card account after validation of the credit card through the magnetic strip card reader 22. A small number of travel-related goods such as travel guides, maps, sunglasses, foreign currency, may be purchased on the spot by way of the goods dispenser 23.

Col. 4, lines 39-68 states:

In order to provide the maximum flexibility in the utilization of the various components of the automatic service terminal and to allow for future expansion, the entire system is managed through the central processor 30. This central processor 30 is used to interpret the complex inputs generated by the customer via the keyboard 20, the coinbox 21, and the credit card reader 22, as well as those generated from the remote site and communicated via the audio communication unit 24. The operating program of the central processor 30 is stored in a non-volatile read only memory 31. This memory contains the programmed code numbers necessary to direct the computer or microcomputer to perform the various functions of the terminal. Intermediate results, variables, etc., required by the operating program, will reside in the read/write memory 29. Both the read only memory 31 and the read/write memory 29 are an integral part with the central processor 30. As implied by the block diagram of FIG. 8, the terminal system employs a bi-directional parallel bus oriented input/output structure. The exact specifications of the bus are typically a function of the central processor and one of the standard types well known by people skilled in the art. The advantage of the bus structure is not only to accommodate the various terminal components, but also to provide for addition of other devices that may be later necessary to support future terminal features. The terminal system is basically a locally controlled device as explained before. A remote interface is also provided for the following features:

Col. 5, lines 1-6 states:

Monitoring of the operational status of the terminal system by remote site computer 42;

Updating the variable data kept in the mass storage unit 28; and

Programming of additional features of capability of the terminal system.

Col. 6, lines 16, 21, 56-61 states:

The printer 11 is constituted by a video hard-copy unit, TEKTRONIX Model 4632, which can generate a hard copy in a 21.6.times.27.9 centimeters (81/2".times.11") from a raster scan video source. Any image displayed on the CRT 10 can also be printed in a 21.6.times.27.9 centimeters (81/2".times.11") format on the printer 11.

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The on-line mass storage unit 28 is a floppy disc device available from SHUGART ASSOCIATES and has a control interface compatible with the I/O bus 40. The central processor 30 is able to store and subsequently retrieve data from the on-line mass storage module 31 on command.

In stating her rejection to Claim 39, the Examiner added a citation to col. 1, lines 57-68 and col. 7, lines 41-66 to the above cites passages to support her assertion that Lockwood et al. teaches integrating the selected product image, the selected product environment image and the selected text segment into a customized visual output. Once again, the newly cited passage from Lockwood et al. fails to teach this limitation. Col. 1, lines 57-68 states:

Offering merchandise related to the service promoted; for instance, dispensing, by coin insertion, travel-related products such as maps, books, guides and foreign currency, in conjunction with the sale and promotion of travel services.

Offering the customer a convenient means for evaluating a variety of products or services presented to him by an audio visual medium; for instance, by highlighting, describing and updating vacation destinations and programs;

Col. 7, lines 41-66 states:

The flight schedule program begins by the display on the CRT of a schedule mask through which the customer is invited to fill in the form and to locations of the flights. When the customer enters the departure point and the destination on the keyboard, two codes are generated which are used to seek the appropriate information in the mass storage or, alternately, are sent via the audio communication system to a remote reservation computer. When the list of available flights has been gathered from the mass storage or received back from the remote computer center, it is displayed on the CRT with an inquiry as to whether the customer wants a hard copy of the schedule. The amount of change to be deposited in order to obtain the hard copy is also displayed. When the proper amount of change is detected in the coinbox, the central processor generates a code which is recognized by the printer as a signal to print the raster scan image being generated on the CRT. At the end of the printing sequence the customer is offered the choice to jump immediately into the flight reservation mode or to return to the basic menu display.

In stating her rejection to Claim 46, the Examiner added a citation to col. 8, lines 39-50 to the above cites passages to support her assertion that Lockwood et al. teaches integrating the selected product image, the selected product environment image and the selected text segment into a customized visual output. Once again, the newly cited passage from Lockwood et al. fails to teach this limitation. Col. 8, lines 39-50 states:

The operational sequences just described are illustrative of the versatility of the terminal. The system can be adapted to various tasks related to the delivery of travel services by mere software changes. The terminal could conceivably be used to promote and sell a variety of services and to facilitate financial transactions. Its comprehensive communication interface makes it an ideal tool for catalogue sales from a central warehouse and an adequate substitute in many cases for the retail store. The terminal could also be adapted to the delivery of a higher grade of services such as professional advice and counseling.

The Applicant respectfully maintains that none of the above quoted passages, and in fact no where in Lockwood et al. is a teaching disclosed for integrating the selected product image, the selected product environment image and the selected text segment into a customized visual output. The closest passage is found in col. 3 in which recordings of various travel documentaries promoting tours, cruises, special events, resort facilities and other vacation opportunities are stored and played. This teaching is significantly different from integrating the selected product image, the selected product environment image and the selected text segment into a customized visual output.

The invention recited within claims 30-55 relates to the preparation and presentation of electronic proposals. As part of the proposals which are generated, the system or method obtains images of the product. This can be an image of an automobile for example. The system or method also obtains text segments which describe the product. This text can describe features, specifications or options of the automobile shown in the product image. Finally, environment images are obtained. These images will place the image of the product in an environment in

which an individual customer is expected to use the product displayed in the product image. For one customer, this environment image may be a camping scene. For another customer, the environment image may be an urban or suburban image. The choice of background environment image allows the proposal to be tailored to the specific interest of each customer. The integration of these three components into a single displayed image creates the customized visual output.

Lockwood et al. fails to teach the use of these three separate data sources and their integration into a single customized visual output. As such, Lockwood et al. fails to teach or suggest each limitation recited in independent claims 30, 39, 46, and 55. Claims 30, 39, 46, and 55 are therefore patentable over Lockwood et al.

The remaining claims all depend from one of the above independent claims. As a result, each of these dependent claims contain the above limitation for integrating the selected product image, the selected product environment image and the selected text segment into a customized visual output. These dependent claims are therefore patentable over Lockwood et al. for the same reasons stated above.

## CONCLUSION

In view of the above arguments, it is submitted that the claims are in condition for allowance. Reconsideration and withdrawal of the rejections are kindly requested. Allowance of all pending claims is respectfully submitted.

Respectfully Submitted,

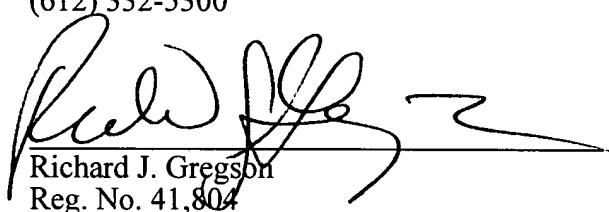
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